

Preliminary Questions for Navy/DLA following Initial Regulator review of TUA Supplemental
Draft 09.07.2021

Allow for discussion between each question. Comfortable with Peter moderating/facilitating this meeting.

Big picture questions

1. What is the basis and rationale for the 2045 target date for secondary containment?
2. Regulatory Agencies need a regulatory tool to consider approving. Would the Navy consider integrating the commitment to secondary containment or relocation by 2045, into the Amend the AOC?
3. Is Navy considering additional ullage on base/on island to allow rapid movement of fuels from leaking tank, or to free up tanks to speed up TIRM and/or secondary containment schedule?
4. Can the Navy briefly describe how each option scores against each criterion for BAPT?
4. 1A BAPT rationale focused on other five options being infeasible due to engineering challenges. How would these same engineering challenges be overcome by a future secondary containment option?
5.
6. If a future secondary containment option is not selected, when will the Navy be developing a contingency plan for defueling by 2045? If secondary containment option is not selected, what are the Navy's future plans?
6.
6. 7. Could the Navy provide an incremental schedule at five-year intervals from now to 2045 that describes plans for TIRM, TUA, risk release identification and enhanced release response capabilities, secondary containment, and potential defueling, risk release identification and enhanced release response capabilities?
- Given Navy's commitment to secondary containment or defueling by 2045, p
7. Please provide schedule and strategies for designing and implementing RHS water treatment and other active fuel removal and containment infrastructure improvements. Will the water treatment plant still be built if the Navy is working toward secondary containment or defuel by 2045?
8.
8. 9. Please provide a schedule and strategies for implementing the secondary containment and TIRM.

Commented [G1]: Trying to get to transparency and ongoing risk mitigation throughout remaining life of the tanks so that releases are investigated and response actions are integrated and tested

Technical questions

1. What is the expected operating life of the tanks with 1A and other options?
1.
2. Which tanks does this TUA 1A proposal apply to?
2.
3. If 1A is approved, how would the current TIRM process change?
3.
4. Why has maintenance program taken longer than the originally proposed 2017 TIRM schedule? Can regulators expect the TIRM schedule presented in the TUA Supplemental to be firm?
4.

5. Describe the protocol for responding to each combination of alarms (for example, SVM and AFE alarms sound) within the system of systems? Does the Navy conduct audits that operators are unaware of to test operator response?

5.

6. What are the criteria to evaluate the performance of tank coatings proposed in 1B (i.e. pressure, hole size, etc)?

6. Placeholder for technical question on how will the Navy continuous improvement and integrate lessons learned from releases or other incidents into improvements to facility and operations? While TIRM is designed to address tanks, how does the Navy inspect and maintain other features of the USF system?

7.

8.7.

Draft Talking Points

- Positives:

- Document is an improvement from the first submission. Recognize a lot of work was put into the report.
- Considerable work has been done since the AOC was established to improve the facility and operations.
- ~~TUA Supplemental helps communicate all the work that technical teams have done under the AOC.~~
- We appreciate that the end goal is secondary containment or defuel.

Commented [ILK2]: Note that most work was done early, not much recently.

Commented [ILK3]: repetitive. Delete.

- Issues:

- ~~We were hoping~~Regulators and the public need a for more robust analysis for why alternatives aren't feasible.
- Use of Navy conclusions from other AOC sections to support the TUA 1A selection is not appropriate, especially as regulators have on record comments disagreeing with some of these lines of evidence. Examples include referring to Navy holding capacity model and natural source zone depletion conclusions and GWFM capture zone conclusions. Further, these lines of evidence, if valid, would support other TUA options as well.
- Lack of information sharing about the May 6th release and the GTTNA study impact credibility of the statements made in the TUA Supplemental that are not supported by evidence and documented analysis. (for ex: system of systems would have prevented the 2014 release; committed to secondary containment by 2045 without a clear plan or clear discussion on what the commitment means).
- Lack of information sharing is delaying progress.
- We need clarity on the plan for secondary containment and the related implications for the technical work and BAPT review process as defined under the AOC.